



UCLA

Office of Contract and Grant Administration

Federal Demonstration Partnership (FDP) Expanded Clearinghouse Pilot for Subawards

*The “FDP Pilot” relates to incoming and outgoing **Subawards***

Per ORA News of 8/2/16 and 8/22/16

What:

- **Effective August 18th**, when working with an FDP Expanded Clearinghouse ***Pilot Participant Institution***, use a short ***Letter of Intent*** instead of a full ***Subrecipient Commitment Form***.

The Letter of Intent (LOI) provides *project specific information* and eliminates *institutional information*

Ex: UCLA Commitment = 5 pages vs. UCLA LOI = 1 page →

Who:

A list of the 79 ***pilot participant institutions*** is at: http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga_173303.pdf.

NOTE: If an institution is ***not*** listed as a pilot participant institution, there is no change to our current process (i.e. sending or receiving full Subrecipient Commitment Form).



FDP EXPANDED CLEARINGHOUSE PILOT SUBRECIPIENT LETTER OF INTENT

This can ONLY be used in lieu of the UCLA OCGA Subrecipient Commitment Form by institutions who are listed as part of the FDP Expanded Clearinghouse Pilot at: http://sites.nationalacademies.org/cs/groups/pgasite/documents/webpage/pga_173303.pdf

Subrecipient (Sub) Legal Name:		Pass-Through Entity (PTE) Legal Name:	The Regents of the University of California, Los Angeles	
Sub DUNS:		PTE DUNS:	092530369	

Information above must match FDP Expanded Clearinghouse Pilot Entity Profile

Sub Principal Investigator:		PTE Principal Investigator:	
Sub Internal Project Identifier (optional):		PTE Internal Project Identifier (ex. PATS #):	

Project Title:				
Prime Awarding Agency:		Complete Project Period:	Start:	End:
Total Proposed Amount for Complete Project Period:	\$	Cost Sharing Amount for Complete Project Period:	\$	

If Cost Sharing, a separate cost share budget and justification should be attached

Project Facilities & Administrative Rates (check one):

Federally negotiated F&A rate that matches our FDP Expanded Clearinghouse Pilot Entity Profile
 A reduced F&A rate dictated by the prime awarding agency. Rate: _____ Base Type: _____
 Not applicable (no indirect costs are requested by Sub)

Project Use Information:

Human Subjects	Yes	No	Animal Subjects	Yes	No	Stem Cells	Yes	No	Genomic Data Sharing	Yes	No
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If Yes, please forward approval(s) to PTE PI as soon as available as approval(s) must be provided before any subaward can be issued

Institutional Authorized Official Information:

Sub Name/Title:		PTE Name/Title:	
Sub Phone:		PTE Phone:	
Sub Email:		PTE Email:	

Sub Email for Awards (if different from above): _____

Sub Place of Performance the same as FDP Expanded Clearinghouse Pilot Entity Profile's: Yes No (for FFATA reporting purposes)

This proposal has been reviewed and approved by the appropriate official(s) of Subrecipient, and certified to its accuracy and completeness. The appropriate programmatic and administrative personnel of Subrecipient involved in this application are aware of the prime awarding agency's policies, agree to accept the obligation to comply with award terms, conditions and certifications, and are prepared to establish the necessary inter-institutional agreement consistent with that policy.

The following documents are attached to this Statement of Intent:

Sub Statement of Work (required)	Sub Budget justification (required)
Sub Detailed Line Item Budget (required)	Other: _____

Signature of Subrecipient's Authorized Official _____ Date _____

Name and Title of Authorized Official _____

Why:

- The U.S. Federal Government requires that each Pass Through Entity (PTE) conducts a Risk Assessment prior to issuing any Subaward/Subaward Amendment. Traditionally, PTEs collect initial institutional information for this Risk Assessment via Subrecipient Commitment Forms.
- Risk Assessments, thus Subrecipient Commitment Forms, typically require institutional information such as audit status/findings, FCOI policy status, EIN/NAICS No., Federalwide Assurances, debarments, registrations, collection of IDC and fringe rate agreements, etc.
- In order to reduce the administrative burden related to incoming and outgoing subawards, pilot participant institution central offices (i.e. OCGA) will be relying on institutional information from profiles housed on the FDP website, instead of institutional information from individual Subrecipient Commitment Forms.

When:

- ***Incoming Subawards:*** If you are asked to complete a *Subrecipient Commitment Form* by a pilot institution on/after August 18, 2016, please politely tell the other pilot institution that both parties are FDP Expanded Clearinghouse Pilot Participants and that a *LOI* with *project specific information* should be used instead. UCLA's *institutional information* can be obtained from our profile on the FDP Expanded Clearinghouse site. This will eliminate the need to provide institutional information via a Subrecipient Commitment Form.
- ***Outgoing Subawards:*** At time of proposal, you should continue to collect necessary authorized project-specific documents from pilot Subrecipients. Instead of the 5-page *UCLA Subrecipient Commitment Form*, you will request the *project specific* 1-page *UCLA Letter of Intent (LOI)*, with authorized signature(s), statement of work, budget(s) and justification(s), plus any other documents required by sponsor guidelines [biosketches, facilities, current and pending support, etc.].
- ***Push Back:*** It will take some time for everyone at pilot institutions to be fully aware of pilot participation, so please be patient as this information trickles down to all staff. However, the FDP has **provided** *sample push back language* to assist pilot participants. Note that UCLA will likely receive push back if we request our Subrecipient Commitment Form be completed by pilot participants.

To Reiterate – Change:

- For Subawards to-from *pilot participant institutions*, no completing institutional information as requested on Subrecipient Commitment Forms.
- Instead of requesting/completing a Subrecipient Commitment Form, complete project specific information only via a short Letter of Intent (LOI).

No change:

- *Pilot participant institution* Subrecipients still need to provide their statement of work, line-item budget(s) and justification(s), plus any other documents required by prime sponsor guidelines [biosketches, facilities, current and pending support, etc.].
- At time of award, Subrecipient subject use approvals (if any) need to be provided.
- If an institution is *not* listed as a pilot participant institution, there will be **no change** to our current process (i.e. sending or receiving full Subrecipient Commitment Forms at the time of proposal, plus applicable attachments).

Example: *Outgoing Subawards*

Subrecipient = USC

Proposal Stage

- UCLA PI competes Determination Checklist
- Collect from ***non***-Pilot Subrecipient
 - ***Commitment Form***, with authorized signature(s), and documents ***triggered*** by Commitment (as applicable):
 - Copy of IDC/fringe rate agreements, PHS Financial Disclosure Form and Assurance Compliance, Audit Certification of Compliance or Financial Audit Management Questionnaire, etc.
 - statement of work, including deliverables,
 - line-item budget(s) and justification(s),
 - plus any other documents required by sponsor guidelines [ex. biosketches, facilities, current & pending support, etc.].

Award Stage (no change)

- Collect subject use approvals (as applicable)
- Submit OCGA Subaward Checklist

Subrecipient = CalTech

Proposal Stage

- UCLA PI competes Determination Checklist
- Collect from ***Pilot*** Subrecipient
 - ***Letter of Intent (LOI)***, with authorized signature(s), and documents ***triggered*** by LOI (as applicable):
 - No additional docs triggered by LOI

- statement of work, including deliverables,
- line-item budget(s) and justification(s),
- plus any other documents required by sponsor guidelines [ex. biosketches, facilities, current & pending support, etc.].

Award Stage (no change)

- Collect subject use approvals (as applicable)
- Submit OCGA Subaward Checklist

FAQs:

- It is a “Pilot” expected to continue through June 30, 2017; ORA News will keep you posted.
- For Subrecipients that are part of system, if one site is listed as pilot participant it does NOT automatically mean all the system-sites are pilot participants (ex. UT Austin = Pilot; UT El Paso = NON Pilot). Check and make sure the specific entity is named on the list.
- The FDP Pilot applies to all incoming and outgoing Subawards handled by OCGA (for *outgoing* Subawards the FDP Pilot applies even if the Prime Sponsor is not federal).
- If we have an upcoming proposal with a pilot participant Subrecipient that has already filled out the Subrecipient Commitment Form, we will accept it instead of the LOI. DO NOT have them also fill out a LOI.
- If we have an existing project with a pilot participant Subrecipient that has filled out the Subrecipient Commitment Form for the entire project period (ex. 5 years) and nothing has changed, we will continue to use it. DO NOT have them also fill out the LOI.
- If we have an existing project with a pilot participant Subrecipient that has filled out the Subrecipient Commitment Form for *only part of* the entire project period (ex. 1 of 5 years), have them fill out the LOI to add any out year(s) [or for any additional/supplemental funds].

- Please share this information with investigators and research administrators in your department/unit.
 - FDP Expanded Clearinghouse: http://sites.nationalacademies.org/PGA/fdp/PGA_171520
- If you have to provide continuing push back to another pilot institution, please let the OCGA Outgoing Subaward Team know, and we can contact that institution on your behalf.
- In addition, if you have any questions about the pilot, please contact the OCGA Outgoing Subaward Team:
 - Assistant Director of Outgoing Subawards, Sharon Lam, slam@research.ucla.edu
 - Subaward Officer, Mary Haskins, mhaskins@research.ucla.edu
 - Website: <http://www.research.ucla.edu/ocga/sr2/Subawards.htm>
- General questions?

Thank you!